## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

UNITED STATES OF AMERICA, ex rel, TERRY JACOBS,

CIVIL ACTION NO. 1:10-CV-536

Relator,

SENIOR JUDGE WILLIAM O. BERTELSMAN

-VS-

LAMBDA RESEARCH, INC., et al.

Defendants.

## MOTION FOR EXTENSION OF TIME

NOW COMES Relator, by and through the undersigned counsel, and hereby requests an extension of thirty (30) days to oppose Defendants' Motion for an Award of Attorneys' Fees and Costs ("Motion") [Doc #78], which was filed on July 16, 2014.

The purpose of this motion is not for delay. Rather, the undersigned counsel has only recently been retained as counsel for Relator, necessitated by this Court Memorandum and Order indicating sanctions would be issued on a joint and several basis, and needs additional time to adequately review the case and prepare a response to the pending motion. Relator's counsel also lacks adequate time to prepare a response to Defendants' Motion due to other pending legal matters that require substantial immediate attention. Accordingly, Relator respectfully requests that this Court extend the time for his response to the Motion, which is currently due August 6, 2014, up to and including September 5, 2014.

Respectfully submitted,

/s/ Patrick J. Perotti

Patrick J. Perotti (#0005481)

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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 30<sup>th</sup> day of July 2014, a copy of the foregoing *Motion for Extension of Time* was electronically filed. Notice of this filing will be sent to counsel of record for all parties by operation of the Court's Electronic Filing System. Parties and their counsel may access this filing through the Court's Electronic Filing System.

/s/ Patrick J. Perotti

Patrick J. Perotti (#0005481)

DWORKEN & BERNSTEIN CO., L.P.A.

Counsel for Relator